

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA**

SEAN SMITH and CRYSTAL SMITH,)

Plaintiffs,)

v.)

CSAA FIRE AND CASUALTY)

INSURANCE COMPANY and)

LISA HOLLIDAY,)

Defendants.)

Case No.: CIV-17-1302-D

(Formerly Payne County District Court

Case No. CJ-2017-501)

**CSAA FIRE AND CASUALTY COMPANY'S FIRST SET OF INTERROGATORIES,
REQUESTS FOR PRODUCTION OF DOCUMENTS AND REQUESTS
FOR ADMISSION TO PLAINTIFF, CRYSTAL SMITH**

TO: Crystal Smith

Steven S. Mansell, OBA No. 10584

Mark A. Engel, OBA No. 10796

Kenneth G. Cole, OBA No. 11792

M. Adam Engel, OBA No. 32384

MANSELL ENGEL & COLE

101 Park Avenue, Suite 665

Oklahoma City, Oklahoma 73102-7201

ATTORNEYS FOR PLAINTIFFS

Pursuant to 12 O.S. §§ 3226, 3233 and 3234, Defendant, CSAA Fire and Casualty Company ("CSAA"), serves the following Interrogatories and Requests for Production of Documents and requests that Plaintiff, Crystal Smith ("Plaintiff"), answer the Interrogatories separately, fully, under oath and in writing and produce for inspection and copying all requested Documents in Plaintiff's possession or control, all within thirty (30) days from the date of service hereof and in accordance with the Instructions and Definitions set out below.

“submitted a claim for this loss to Defendant CSAA on or about November 7, 2015” when the alleged date of loss was not until November 7, 2016.

INTERROGATORY NO. 17. Explain in detail why You and/or Your husband, Sean Smith, did not submit Your claim to CSAA for this loss until on or about August 24, 2017.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1. Produce all communications (regardless of whether created or stored electronically or otherwise) between You (including Your representatives) and Defendant relating, to any degree, to the subject loss or the resulting insurance claim.

REQUEST FOR PRODUCTION NO. 2. Produce all communications (regardless of whether created or stored electronically or otherwise) between You (including any representative) and any third party (excluding Your counsel) relating, to any degree, to the subject loss or the resulting claims. NOTE: This Request includes any communications related to the underlying insurance claim, as well as the breach of contract and bad faith claims asserted in this lawsuit.

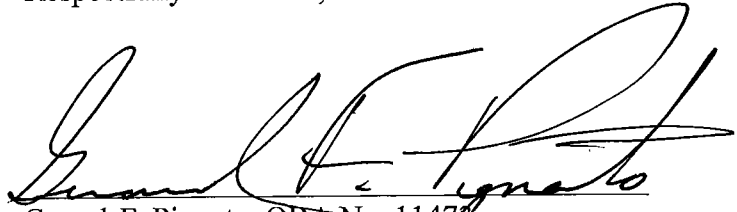
REQUEST FOR PRODUCTION NO. 3. Produce all Documents, regardless of whether created or stored electronically or otherwise, which reference, to any degree, the nature and extent of Your alleged damages/injuries which are the subject of this lawsuit.

REQUEST FOR PRODUCTION NO. 4. Produce all Documents, regardless of whether created or stored electronically or otherwise, which reference, to any degree, the amount of damages You are seeking in this lawsuit.

REQUEST FOR PRODUCTION NO. 5. Produce all photographs or videos that depict, to any degree, the damage You attribute to the Incident giving rise to this lawsuit.

REQUEST FOR PRODUCTION NO. 6. Produce all photographs and videos that depict, to any degree, the subject property prior to the Incident giving rise to this lawsuit. NOTE:

Respectfully submitted,



Gerard F. Pignato, OBA No. 11478

R. Greg Andrews, OBA No. 19037

PIGNATO, COOPER, KOLKER & ROBERSON, P.C.

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**ATTORNEYS FOR DEFENDANT,
CSAA FIRE AND CASUALTY INSURANCE
COMPANY**

CERTIFICATE OF SERVICE

This is to certify that on the 16 day of February 2018, a true and correct copy of the above

and foregoing instrument was forwarded to:

Via Email

Steven S. Mansell, OBA #10584

Mark A. Engel, OBA #10796

Kenneth G. Cole, OBA #11792

M. Adam Engel, OBA #32384

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